

REMARKS

Applicant has carefully reviewed and considered the Office Action mailed on April 1, 2003, and the references cited therewith.

Claims 1, 7, 8, and 12 are amended, and claims 13 and 14 are added; as a result, claims 1-14 are now pending in this application.

§112 Rejection of the Claims

Claims 1-12 were rejected under 35 USC § 112, first paragraph, as containing subject matter which was not described in the specification in such a way as to enable one skilled in the art to which it pertains, or with which it is most nearly connected, to make and/or use the invention.

Applicant respectfully traverses the rejection of claims 1-12.

The application, at pages 4-10 describes in detail using equations, tables, and examples the method of transforming words into "unique numerical representation". In addition, Figure 2 illustrates graphically one example embodiment of obtaining the unique numerical representation of a word. Further, application, at page 10, lines 5-12 and the example shown in the table on page 10, clearly defines the language "similar numerical representation". These portions of the figures and specification, among other, enable a person of ordinary skill in the art to make and use the invention commensurate with the scope of the claims 1-12.

In addition, Applicant has amended claims 1 and 8 by replacing the offending word "translated" with the word "transformed". Allowance of claims 1-12 is respectfully requested.

§102 Rejection of the Claims

Claim 1 was rejected under 35 USC § 102(b) as being anticipated by Pfeiffer (U.S. Patent No. 3,645,015).

Amended claim 1 is respectfully asserted to distinguish over Pfeiffer. Pfeiffer in col. 1, lines 4-15, lines 44-45, and line 62 and in col. 6, claim 1, line 1 describes a Morse code teaching device that translates merely the Morse signals into letter, and finally into words, and vice versa, and does not teach a method of "transforming each of the received words into unique numerical representations such that the transformed unique numerical representations does not result in

multiple similar numerical representations", as recited in claim 1. It can be seen in the table shown on page 10, that the prior art method yields a similar numerical representation for the two example dissimilar words shown in the table, whereas the method disclosed in the specification yields a unique numerical representation for each of the two example dissimilar words in the table. Therefore, a word transformed into a unique numerical representation using the method disclosed in the specification does not result in multiple similar representations, as shown in the table on page 10 and as recited in claim 1. Independent claim 1 should thus be allowable, and such action is respectfully requested.

Claims 1 and 2 were rejected under 35 USC § 102(b) as being anticipated by Kusnick (U.S. Patent No. 5,892,470).

Amended claim 1 is respectfully asserted to distinguish over Kusnick. Kusnick in col. 2, lines 7-9, lines 23-24, and lines 47-58, in col. 6, claim 1, lines 33-36, and in FIGS. 3 and 4 describes a technique for encoding a number as a sequence of words. The words themselves are selected from a table of words. Kusnick does not teach a method of "transforming each of the received words into unique numerical representations such that the transformed unique numerical representations does not result in multiple similar numerical representations", as recited in claim 1. Independent claim 1 should thus be allowable, and such action is respectfully requested.

Claim 2 which is dependent form independent claim 1, should therefore also be found to be allowable, and such action is respectfully requested.

§103 Rejection of the Claims

Claims 3-6 and 8-11 were rejected under 35 USC § 103(a) as being unpatentable over Kusnick in view of as applied to claim 1 above, and further in view of Chundi et al. (U.S. Patent No. 6,502,091).

Applicant respectfully traverses the rejection of claims 3-6 and 8-11 as follows:

Independent claims 1 and 8 are respectfully asserted to distinguish over Kusnick for the reasons presented above. Further, claims 3-6 and 8-11 are respectfully asserted to distinguish over the Kusnick and Chundi references. None of these references describe transforming words

to unique numerical representations such that the transformed unique numerical representations does not result in multiple similar numerical representations, as recited in claims 1 and 8. Chundi in col 2, lines 50-61 describes a method for relating user queries and documents by identifying contexts associated with a user query. Furthermore, Chundi does not teach morphologizing key-words based on similarities of fundamental characteristics, as recited in claims 3 and 8. In addition, Chundi does not teach extracting one or more key-words based on a specific criteria selected from the group comprising filtering to remove all words comprised of three or fewer letters, and filtering to remove rarely used words, as recited in claims 4 and 9.

Applicant respectfully asserts that Kusnick and Chundi references fail to support a *prima facie* case of obviousness because, as mentioned above, the cited references fail to teach or suggest all of the elements of Applicant's invention, such as a technique to transform words to unique numerical representations such that the transformed unique numerical representations does not result in multiple similar numerical representations.

For the above reasons, claims 3-6 and 8-11 should be found to be allowable over the Kusnick and Chundi references, and such action is respectfully requested.

Allowable Subject Matter

Claims 7 and 12 were indicated to be allowable if rewritten to overcome the rejection(s) under 35 USC § 112, first paragraph, set forth in the Office Action and to include all of the limitations of the base claim and any intervening claims. Applicant has amended these claims accordingly. Reconsideration of these claims is respectfully requested.

CONCLUSION

Applicant respectfully submits that the claims 1-14 are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney, Prakash Nama, at 603-888-7958 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743

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